

**IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN  
GREEN BAY DIVISION**

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Oneida Nation,

Plaintiff,

Case No. 16-CV-1217

v.

Village of Hobart, Wisconsin,

Defendant.

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**STIPULATION FOR PROTECTIVE ORDER**

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WHEREAS, the Parties expect that certain information discoverable in this case consists of non-public CONFIDENTIAL information including, but not limited to, research, technical, commercial, or financial information, medical information concerning any individual, personal-identity information, non-public law-enforcement records, personnel records, or other records that the respective parties customarily maintain in confidence; and

WHEREAS, the Parties anticipate they will be producing a significant amount of documents and information during the discovery phase of this litigation; and

WHEREAS, the public disclosure of such confidential documents and information presents an unreasonable risk of causing harm to the disclosing Party or third parties to whom such confidential information belongs; and

WHEREAS, the Parties believe that good cause exists for the entry of this Stipulated Protective Order (“Protective Order”), which is narrowly tailored to protect the aforementioned confidential documents and information of the Parties.

NOW THEREFORE, by reason of the foregoing, the Parties, by their undersigned counsel, jointly request that this Court, under Fed. R. Civ. P. 26(c) and Civil L. R. 26(e), enter the Stipulated Protective Order attached as Exhibit A regarding CONFIDENTIAL documents and information in this matter.

Dated this 6th day of July, 2017.

/s/Paul R. Jacquart

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Dated this 6th day of July, 2017.

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